

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS H. HAGLOF,

Defendant.

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Cause No. 4:20-CR-00384 HEA/SPM

**DEFENDANT’S UNOPPOSED MOTION TO
CONTINUE HEARING ON DEFENDANT’S MOTION FOR SUBPOENA**

Comes now Defendant Nicholas H. Haglof, by and through counsel, and respectfully requests a continuance of the Motion Hearing scheduled for December 10, 2021. Defendant requests the Court continue the hearing for at least thirty-days. In support of this motion, Counsel states as follows:

1. Defendant has been charged with one count of Receipt of Child Pornography and one count of Accessing with Intent to View Child Pornography.
2. Defendant previously filed a Motion for a Subpoena Pursuant to Federal Rule of Criminal Procedure 17(c). (Doc. 38). The Court set the motion for hearing on December 10, 2021.
3. Today the parties reached a tentative plea agreement, though the agreement has not been finalized in writing. The parties need time to draft the document and finalize some of the particulars of the agreement.
4. Both parties agree that it would not be proper for Defendant to withdraw his motions and waive remaining motions until after the written plea agreement is signed.
5. Between these issues and the holiday season the parties agree more time is needed.

6. A trial date has not been set for the cause.

7. The Government has no objection to this request per AUSA Jillian Anderson.

8. Defense Counsel respectfully requests the Court set this matter for a status hearing in mid to late January. If the plea agreement is finalized by then the hearing could be converted to a withdrawal and waiver hearing. Alternatively, if for any reason the plea agreement is not finalized the Court could set all final motions hearings shortly thereafter.

9. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a continuance of the motion hearing set on December 10, 2021, for at least thirty-days.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

By /s/ Daniel A. Juengel
DANIEL A. JUENGEL (#42784MO)
Attorneys for Defendant
7710 Carondelet Avenue, Suite 350
Clayton, Missouri 63105
(314) 725-7777

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

/s/ Daniel A. Juengel

DANIEL A. JUENGEL